

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Franklin Spencer : No. 19-13663-MDC
Debtor : :

RESPONSE TO MOTION OF THE BANK OF NEW YORK MELLON
FOR RELIEF FROM THE AUTOMATIC STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. Debtor avers payments may have been late due to the time line at which he receives his Pension and Social Security income and wishes to review a copy of Movant's accounting.-19.
8. Denied.
9. Denied.
10. Debtor is requesting the opportunity to apply for a Loan Modification as his previous Application was halted due to issues surrounding COVID-19.
11. Debtor opposes the same.
12. No response required.

WHEREFORE, the Debtor respectfully requests that the Movant's Motion for Relief be DENIED.

/s/ David M. Offen
David M. Offen
Attorney for Debtor(s)

Dated:9/9/20

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CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Rebecca Solarz on behalf of The Bank of New York Mellon
bkgroup@kmlawgroup.com

Dated: 9/9/20

/s/ David M. Offen
David M. Offen
Attorney for Debtor